

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Case No: 17-10325  
: :  
Rhonda Y Stearns, : Chapter 13  
Debtor, :  
\_\_\_\_\_  
Rhonda Y Stearns, : Related to Docket No: 67  
Movant, : Hearing Date and Time:  
: :  
vs. :  
: :  
Ronda J. Winnecour, Esquire, :  
Chapter 13 Trustee, :  
Respondent. :  
:

**NOTICE OF HEARING WITH RESPONSE DEADLINE ON  
APPLICATION TO APPOINT SPECIAL COUNSEL**

**TO THE RESPONDENTS:**

You are hereby notified that the above Movant seeks an Order affecting your rights or property.

You are further notified to file with the Clerk and serve upon the undersigned attorney for Movant a response to the motion no later than **July 6, 2019** according to Bankruptcy Procedure, Local Rules and Procedures of this Court, and the procedures of the Presiding Judge as found on the Judge's web page at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely respond, the Motion may be granted by the Court by default without a hearing.

You should take this to your lawyer at once.

A hearing will be held on **August 7, 2019 at 9:30 a.m.** before Judge THOMAS P. AGRESTI, in Bankruptcy Courtroom, 17 South Park Row, Erie, PA 16501. Only a limited time of 10 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled at a later date by the Court. An order granting the relief sought may be entered and the hearing may not be held if you do not timely file and serve a written response.

Date of Mailing or other service: June 19, 2019

Respectfully submitted,  
/s/ Daniel P. Foster, Esquire  
Daniel P. Foster  
PA I.D. # 92376  
Foster Law Offices  
PO Box 966  
Meadville, PA 16335  
Phone: 814-724-1165

**CERTIFICATE OF SERVICE**

I, Clarissa Bayhurst, the undersigned Paralegal of Foster Law Offices, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the **Application to Appoint Special Counsel AND Notice of Hearing** by First-Class Mail, U.S. Postage Paid on the parties below\*.

Executed on: June 19, 2019

By: /s/ Clarissa Bayhurst  
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Ally Bank  
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Roseville MN 55113-0004

Specialized Loan Servicing LLC  
8742 Lucent Blvd, Suite 300  
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Ally Bank serviced by Ally Servicing LLC  
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State Farm Bank  
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